IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE MEMPHIS DIVISION

MARTHA JANE RENFROE JONES,)	
Plaintiff,)	
,)	Civil Action No:
v.)	JURY DEMANDED
)	
THE VILLAGES OF GERMANTOWN,)	Removed from the Circuit
THE VILLAGES OF GERMANTOWN, INC.,)	Court of Shelby County,
CRSA/LCS DEVELOPMENT, LLC and)	Tennessee
CRSA/LCS MANAGEMENT, LLC,)	No. CT-004372-14
)	Div VIII
Defendants.)	

NOTICE OF REMOVAL

COME NOW The Villages Of Germantown, The Villages Of Germantown, Inc., CRSA/LCS Development, LLC and CRSA/LCS Management, LLC, and file this Notice of Removal by showing the Court as follows:

1.

A civil action was filed by Plaintiff in the Circuit Court for Shelby County, State of Tennessee, naming the Defendants The Villages Of Germantown, The Villages Of Germantown, Inc., CRSA/LCS Development, LLC and CRSA/LCS Management, LLC, being Civil Action No. CT-004372-14, the Complaint and all process and orders served upon such Defendants in such action being attached hereto as Exhibit "A." Examination of Plaintiff's Complaint filed in the State court shows the underlying cause of action is a medical malpractice case involving care and treatment at the defendant nursing home, located in Shelby County, Tennessee. Plaintiff is a resident of DeSoto County, Mississippi and all defendants are corporations in Tennessee or Iowa.

2.

The foregoing action is properly removable to this Court pursuant to 28 U.S.C. §1441(a), 28 U.S.C. §§ 1446 (a) and (b), and in accordance with 28 U.S.C. § 1332(a)(2), diversity of citizenship, where jurisdiction arises where the action is between citizens of different states. Plaintiff's Complaint does not specify an amount of damages claimed, but seeks actual damages for personal injury for alleged "serious injuries," as well as punitive damages and damages under the Tennessee Adult Protection Act, which Defendant believes would be well in excess of the \$75,000 jurisdictional requirement.

3.

Now within thirty days after the receipt by the Defendants of a copy of the initial pleading setting forth the claim upon which the Plaintiff's action is based, notice is hereby given, in accordance with 28 U.S.C. § 1446 and pursuant to Rule 81 of the Federal Rules of Civil Procedure, of the removal of so said action to this Court.

4.

A copy of the Notice of Removal filed with State Court is attached hereto as Exhibit "B."

Respectfully submitted,

HALL BOOTH SMITH, P.C.

/s/ Charles E. Moody

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent via U.S. Mail, postage prepaid, and E-mail, to the following on this 19th day of November, 2014.

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/s/ Charles E. Moody
Charles E. Moody